

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**J.B., a minor child, by and through
his next friend, ADDIE WARD, on
Behalf of himself and all others
similarly situated;**

Plaintiff,

vs.

**WALTER WOOD, in his individual
capacity,**

Defendant.

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CASE NO: 2:06cv00755-MHT

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**J.B., a minor child, by and through
his next friend, ADDIE WARD, on
Behalf of himself and all others
similarly situated;**

Plaintiff,

vs.

**WALTER WOOD, in his individual
capacity,**

Defendant.

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CASE NO: 2:06cv00908-MEF

**PLAINTIFF'S SUPPLEMENTAL FILING IN RESPONSE TO DEFENDANT
WALTER WOOD'S MOTION MOTION FOR SUMMARY JUDGMENT**

Plaintiff J.B. hereby submits the following exhibit in response to his Motion
for Summary Judgment.

Plaintiff hereby submits the following exhibit:

31. Case Action Summary for R.P. v. Department of Youth Services,

CV-2002-34; J.N. v. DYS, CV-02-94; C.F. v. Walter Wood, CV-02-119, all in the Circuit Court for Montgomery County, Alabama.

/s/Robert D. Drummond, Jr.
ROBERT D. DRUMMOND, JR. (DRU004)
Attorney for Plaintiff

OF COUNSEL:

323 De La Mare Avenue
Fairhope, Alabama 36532
(251) 990-6249

/s/Michael J. Crow
MICHAEL J. CROW (CRO039)
Attorney for Plaintiff

OF COUNSEL:

BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
P.O. Box 4160
Montgomery, AL 36103-4160
(334) 269-2343 - Telephone
(334) 954-7555 - Facsimile

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

T. Dudley Perry
P.O. Box 66
Mt. Meigs, AL 36057

Michael Crow
P.O. Box 4160
Montgomery, AL 36103-4160

Robert D. Drummond
Attorney at Law
323 De LaMare
Fairhope, AL 36532

/s/Robert D. Drummond, Jr.
OF COUNSEL

EXHIBIT # 31



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Alabama SJIS Case Detail

<div> <div>Settings</div> <div>Parties</div> <div>Case Action Summary</div> <div>Witness List</div> <div>Financial</div> <div>Consolidated CAS</div> </div>							
Case							
County	03	Case Number	CV 2002 000119 00	JID	J-H	Trial	J
Style	C F A MINOR BY & THRU NEXT FRIEND MYRTLE FRAZIER VS WALTER WOOD						
Code	TONG	Type	NEGLIGENCE-GENERAL	Filed	01102002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	001
DJID	J-H	Court Action	S (SETTLED) 03252003	For	N		
Damages-Comp		Damages-Pun		Damages-Gen		No Damages	
Trial Days		Lien					
Settings							
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	JTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2	0815 A	Description	HEAR HEARING
Date 3	01062003	Que 3	001	Time 3	0845 A	Description	PTRC PRETRIAL CONFERENCE
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why		Cont #	01		
RevJmt		Admin Date		Why			
Appeal Date		CRT		Case	0000 000000 00		
TBNV1		TBNV2		DSDT		DTYP	
Comment 1	FILE SEALED IN VAULT. SEE ORDER.						
Comment 2							
Party 1							
Party	C 001	Name	C F A MINOR BY & THRU HIS NEXT FRIEND	Type	INDIVIDUAL		
INDX	D/WOOD WALTER	ANAM		JID	J-H		
SSN		Address 1	FRAZIER MYRTLE	Sex			
DOB		Address 2		Race			
Country	US	City	AL 00000 0000	Phone	334 000 0000		
Atty 1	DRUMMOND ROBERT DEAN	Atty 2		Atty 3		Atty 4	
Atty 5		Atty 6					
Issued		Type		Reissue		Type	
Return		Type		Return		Type	
Service		Type		Serv On		By	
Answer		Type		NS Not		NA Not	
Warrant		Type		Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment							
Party 2							
Party	D 001	Name	WOOD WALTER	Type	INDIVIDUAL		
INDX	P/FRAZIER MYRT	ANAM		JID	J-H		
SSN		Address 1	AL DEPT OF YOUTH SERVICES	Sex			
DOB		Address 2	MT MEIGS ROAD	Race			
Country	US	City	MT MEIGS AL 36057 0000	Phone	334 000 0000		
Atty 1	PERRY T DUDLEY JR	Atty 2		Atty 3		Atty 4	
Atty 5		Atty 6					
Issued		Type		Reissue		Type	
Return		Type		Return		Type	
Service	01152002	Type	S SERVED PERSON	Serv On		By	
Answer	02202002	Type	D COMP DENIED	NS Not		NA Not	
Warrant		Type		Arrest			

CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment							
Case Action Summary							

Date	Time	Code	Comments	Operator
01012010	1549	TEXT	CASE SEALED 3-25-03. FILE IN VAULT*****	JAM
01012010	1549	TEXT	****ADD ANY PLEADINGS TO CAS IN VAULT*****	JAM
01012010	1549	TEXT	*****	JAM



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Alabama SJIS Case Detail

Settings

Parties

Case Action Summary

Witness List

Financial

Consolidated CAS

Case							
County	03	Case Number	CV 2002 000094 00	JID	J-H	Trial	J
Style	JN A MINOR BY & THRU NEXT FRIEND KATHY TRUSTY VS DEPT OF YOUTH SERVICE						
Code	TONG	Type	NEGLIGENCE-GENERAL	Filed	01072002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	001
DJID	J-H	Court Action	S (SETTLED) 03252003	For	N		
Damages-Comp		Damages-Pun		Damages-Gen		No Damages	
Trial Days		Lien					
Settings							
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	JTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2	0815 A	Description	HEAR HEARING
Date 3		Que 3		Time 3		Description	
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why		Cont #	02		
RevJmt		Admin Date		Why			
Appeal Date		CRT		Case	0000 000000 00		
TBNV1		TBNV2		DSDT		DTYP	
Comment 1	FILE SEALED IN VAULT. SEE ORDER.						
Comment 2							
Party 1							
Party	C 001	Name	JN A MINOR BY & THRU NEXT FRIEND KATHY TRUSTY	Type	INDIVIDUAL		
INDX	D/YOUTH SERVIC	ANAM		JID	J-H		
SSN		Address 1	TRUSTY KATHY	Sex			
DOB		Address 2		Race			
Country	US	City	AL 00000 0000	Phone	334 000 0000		
Atty 1	DRUMMOND ROBERT DEAN	Atty 2		Atty 3		Atty 4	
Atty 5		Atty 6					
Issued		Type		Reissue		Type	
Return		Type		Return		Type	
Service		Type		Serv On		By	
Answer		Type		NS Not		NA Not	
Warrant		Type		Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment							
Party 2							
Party	D 001	Name	WOOD WALTER	Type	GOVERNMENT		
INDX	P/TRUSTY KATHY	ANAM		JID	J-H		
SSN		Address 1	AL DEPT OF YOUTH SERVICES	Sex			
DOB		Address 2	MT MEIGS ROAD	Race			
Country	US	City	MT MEIGS AL 36057 0000	Phone	334 000 0000		
Atty 1	TOMPKINS TERRI OLIVE	Atty 2	PERRY T DUDLEY JR	Atty 3		Atty 4	
Atty 5		Atty 6					
Issued	01082002	Type	S SHERIFF	Reissue		Type	
Return		Type		Return		Type	
Service	01102002	Type	S SERVED PERSON	Serv On		By	
Answer	02202002	Type	D COMP DENIED	NS Not		NA Not	

Warrant		Type		Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment							
Case Action Summary							

Date	Time	Code	Comments	Operator
01012010	1552	TEXT	CASE SEALED 3-25-03. FILE IN VAULT*****	JAM
01012010	1552	TEXT	*****ADD ANY PLEADINGS TO CAS IN VAULT*****	JAM
01012010	1552	TEXT	*****	JAM



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Alabama SJIS Case Detail

Settings

Parties

Case Action Summary

Witness List

Financial

Consolidated CAS

Case							
County	03	Case Number	CV 2002 000034 00	JID	J-H	Trial	J
Style	R P A MINOR BY & THROUGH NEXT FRIEND DORIS PORTER VS DEPT OF YOUTH SER						
Code	TONG	Type	NEGLIGENCE-GENERAL	Filed	01042002	Track	
Amount		Status	DISPOSED	Plaintiffs	001	Defendants	001
DJID	J-H	Court Action	S (SETTLED) 03252003			For	N
Damages-Comp		Damages-Pun		Damages-Gen		No Damages	
Trial Days		Lien					
Settings							
Date 1	06232003	Que 1	001	Time 1	0900 A	Description	JTRL TRIAL - JURY
Date 2	03132003	Que 2	001	Time 2	0815 A	Description	HEAR HEARING
Date 3		Que 3		Time 3		Description	
Date 4	12022002	Que 4	001	Time 4	0900 A	Description	STAT STATUS REVIEW/DKT
Cont Date	11142002	Why				Cont #	02
RevJmt		Admin Date		Why			
Appeal Date		CRT		Case	0000 000000 00		
TBNV1		TBNV2		DSDT		DTP	
Comment 1	FILE SEALED IN VAULT. SEE ORDER.						
Comment 2							
Party 1							
Party	C 001	Name	R P A MINOR BY & THROUGH NEXT FRIEND		Type	INDIVIDUAL	
INDX	D/YOUTH SERVIC	ANAM			JID	J-H	
SSN		Address 1	PORTER DORIS		Sex		
DOB		Address 2			Race		
Country	US	City	AL 00000 0000		Phone	334 000 0000	
Atty 1	DRUMMOND ROBERT DEAN	Atty 2		Atty 3		Atty 4	
Atty 5		Atty 6					
Issued		Type		Reissue		Type	
Return		Type		Return		Type	
Service		Type		Serv On		By	
Answer		Type		NS Not		NA Not	
Warrant		Type		Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment	REFUND OF OVERPAYMENT OF FILING FEES						
Party 2							
Party	D 001	Name	WOOD WALTER		Type	GOVERNMENT	
INDX	P/PORTER DORTO	ANAM			JID	J-H	
SSN		Address 1	AL DEPT OF YOUTH SERVICES		Sex		
DOB		Address 2	MT MEIGS ROAD		Race		
Country	US	City	MT MEIGS AL 36057 0000		Phone	334 000 0000	
Atty 1	TOMPKINS TERRI OLIVE	Atty 2	PERRY T DUDLEY JR	Atty 3		Atty 4	
Atty 5		Atty 6					
Issued	01072002	Type	S SHERIFF	Reissue		Type	
Return		Type		Return		Type	
Service	01152002	Type	S SERVED PERSON	Serv On		By	
Answer	02202002	Type	D COMP DENIED	NS Not		NA Not	

Warrant		Type		Arrest			
CACT	S (SETTLED)	Date	03252003	For	N	Exep	O
AMT		Cost		Other		Satisfied	
Comment							
Case Action Summary							

Date	Time	Code	Comments	Operator
01012010	1548	TEXT	CASE SEALED 3-25-03 - FILE IN VAULT	JAM
01012010	1548	TEXT	*****ADD ANY PLEADINGS ON CAS IN VAULT*****	JAM
01012010	1548	TEXT	*****	JAM